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MATTHEW J. KLUGER ATTORNEY AT LAW

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September 10, 2020

By ECF

The Honorable Kimba M. Wood United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

MEMO ENDORSED

Re:

United States v. Joseph Asan

20 Cr. 86 (KMW)

Dear Judge Wood:

I represent defendant Joseph Asan in the above-referenced matter, which is currently scheduled for a status conference on September 17, 2020 at noon. With the consent of A.U.S.A. Sagar Ravi, I write now to respectfully request that the conference be adjourned for 45-days.

Defense counsel continues to review the voluminous discovery in this matter and to engage in meaningful plea discussions with the Government. Moreover, the current COVID-19 health crisis counsels against an in-court appearance at this time. For the reasons stated herein and in the interest of justice, the defense has no objection to the exclusion of time for speedy trial purposes.

Thank you.

The conference is adjourned

Respectfully,

† November 9, 2020, at 2:00p.m.

/s/ Matthew J. Kluger Matthew J. Kluger, Esq.

cc: AUSA Sagar K. Ravi

SO ORDERED: N.Y., N.Y. 9/10/20

KIMBA M. WOOD U.S.D.J.